

**LAW OFFICES OF ALLA KACHAN, P.C.**  
**3099 CONEY ISLAND AVENUE, 3 FLOOR**  
**BROOKLYN, NEW YORK 11235**  
**TELEPHONE (718) 513-3145**  
**FACSIMILE (347) 342-3156**  
**E MAIL alla@kachanlaw.com**

May 25, 2016

Office of the United States Trustee  
Eastern District of New York  
201 Varick Street, 1006  
New York, New York 10014  
Attn.: Nazar Khodorovsky, Esq.

Re: LRB Nurses Registry, Inc., Chapter 11, Case No. 15-45532 (CEC)

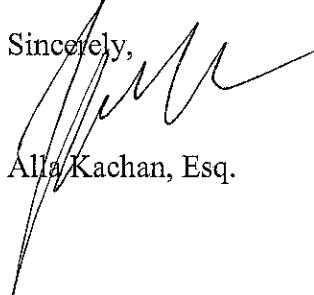
Dear Mr. Khodorovsky:

In response to the communication by the law offices of Ortiz& Ortiz, LLP on May 24<sup>th</sup>, 2016, please be advised that our office has filed a notice of appearance in this case, on behalf of Abraham Greenhut, and intend to dispute the bid of \$2,300,000.00. Our client made the bid in reliance on a misrepresentation the erms of the sale. Specifically, the property was represented to be vacant at closing and for the transfer taxes to be included in the price. Upon arriving at the auction, and learning that the terms of the sale were in fact different with regard to these two factors, my client lowered his bid to \$1,900,000.00 to account for the discrepancy in price which the misrepresentation of terms reasonably represented.

On May 24<sup>th</sup>, 2016, a good faith offer of \$2,100,000 inclusive of transfer taxes and on the condition that the property is delivered vacant, was presented to Ortiz & Ortiz by our office. In the alternative, the bid of \$1,900,000.00 taking into account transfer taxes and the fact that the property is not vacant, would remain as the original offer.

While the good faith offer is being considered, and the bid amount is in dispute, we feel that it is premature to return the deposit of WR Acquisitions Co., and therefore object to the proposed changes to the bidding procedures.

Sincerely,

  
Alla Kachan, Esq.